Federal Information Technology Acquisition and Reform Act (FITARA)

Implementation Plan & CIO Assignment Plan

January 2016
Version 1.2

Version Number	Date	Description	Major Changes to the Version
1.0	08/15/2015	Initial draft of 2015 GSA FITARA Implementation Plan and CIO Assignment Plan.	Not applicable.
1.1	11/9/2015	Second draft of 2015 GSA FITARA Implementation and CIO Assignment Plan.	Addressed OMB comments received for initial draft.
1.2	1/15/2016	Approved version of 2015 GSA FITARA Implementation and CIO Assignment Plan by OMB.	Updated to GSA standard word template.

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1 Introduction

The General Services Administration (GSA) is pleased to present its implementation plan for the Common Baseline for IT Management as proposed by the Office of Management and Budget (OMB) to assist agencies in meeting the mandates of the Federal Information Technology Acquisition Reform Act (FITARA).

Our plan is characterized by the rigorous governance and functional integration that are outcomes of GSA's consolidation of information technology responsibility and authority under the agency Chief Information Officer begun in 2012. The consolidation of information technology operations anticipated and positions GSA to very effectively respond to the requirements of FITARA and the Common Baseline for IT Management.

The next several pages will outline what GSA is doing to implement the key requirements of the Common Baseline for IT Management. We have, as well, enclosed our CIO Assignment Plan laying out the delegation of authority for GSA IT.

2 GSA FITARA Implementation Plan

CIO Role and Responsibilities

2.1 Budget Formulation

AI.	**Visibility of IT resource plans/decisions to CIO.** The CFO and CIO jointly shall define the level of detail with which IT resource levels are described distinctly from other resources throughout the planning, programming, and budgeting stages. This should serve as the primary input into the IT capital planning and investment control documents submitted with the budget (formerly Exhibits *53* and *300).*
A2.	Visibility of IT resource plans/decisions in budget materials. The CFO and CIO jointly shall define the level of detail with which IT resource levels are described as detailed in AI.

Response: GSA will rely upon a well-established governance framework that is tightly integrated with the budget development and execution processes to support this requirement of FITARA implementation. GSA's CIO is a member of all key Investment Review Boards at GSA. This provides a firsthand view to upcoming new initiatives, reprogramming requests, and portfolio performance.

The budgeting process, overseen by the CFO, requires the preparation, review, and approval of an Executive Business Case (EBC) for all initiatives. The EBC provides the rationale for the proposed investment, describes the alignment of the investment to agency strategy, offers an alternative analysis, posits benefits, and forecasts return on investment. GSA IT reviews all business cases for potential IT components or impacts to the IT portfolio of resources. If there is an IT component, the CIO or the CIO's delegate, the Associate CIO, is required to review and approve the requirements and estimated costs. The outcomes of these reviews inform the updates to the agency capital planning process which results in the input to the agency IT portfolio summary and major IT business cases (formerly Exhibits 53 and 300).

B1.	**CIO role in pre-budget submission for programs that include IT and overall portfolio.** The agency head shall ensure the agency-wide budget development process includes the CFO, CAO, and CIO in the planning, programming, and budgeting stages for programs that include IT resources (not just programs that are primarily IT oriented). The agency head, in consultation with the CFO, CIO, and program leadership, shall define the processes by which program leadership works with the CIO to plan an overall portfolio of IT resources that achieve program and business objectives and to develop sound estimates of the necessary IT resources for accomplishing those objectives.
B2.	**CIO role in pre-budget submission for programs that include IT and overall portfolio.** The agency head shall ensure the agency-wide budget development process includes the CFO, CAO, and CIO as described in B I and that CIO guidelines are applied to the planning of all IT resources during budget formulation. The CFO and program leadership shall work jointly with the CIO to establish the processes and definitions described in B I.
Response: GSA will rely upon existing management controls for FITARA implementation. To streamline and

integrate budget, and pre-budget processes, the GSA IT and the OCFO teams have collaborated to develop GSA budget and Executive Business Case (EBC) guidance and templates. The agency OCFO requires any new investment requests, over $250K (non-IT and IT), to submit an EBC. This threshold is codified in the Agency's budget guidance by the OCFO, but it is flexible based upon agency requirements and the CFO may elect to require an EBC for any investment, regardless of the amount requested.

The OCFO and the GSA IT CIO or the CIO's designees, the Associate CIOs, review all new investment requests and EBCs to ensure alignment with agency and business strategies, conformity with GSA's enterprise architecture, and to prevent duplication, and capitalize on opportunities for shared services or reusable technology solutions. While GSA IT is exclusively responsible for IT resourcing and management, the existing enterprise IT governance structure is leveraged to review EBCs for both IT and non-IT requests. Once EBCs are reviewed by the CIO and CFO teams, the proposals are presented to the enterprise governance boards including the program advisory boards and the IRB of which, the CFO, CIO, CAO are members in addition to the Deputy Administrator and business line Commissioners.

The EBC is standard across GSA and does not necessarily determine an investment to be categorized as major or non-major. The GSA Capital Planning Investment Control (CPIC) team maintains 9 criteria, based on OMB guidelines, for categorizing an IT investment. If an investment meets at least one of the 9 criterion it is considered a major; and those that do not meet at least one of the 9 criteria are considered non-majors. The CIO, through the GSA enterprise governance structure, reviews the existing IT portfolio (includes major and non-major investments) on an ongoing basis through the agency Capital Planning processes, high risk investment reviews, project health checks, benefits realization, and application rationalization processes.

CI.	**CIO role in planning program management.** The CIO shall be included in the internal planning processes for how the agency uses IT resources to achieve its objectives. The CIO shall approve the IT components of any plans, through a process defined by the agency head that balances IT investments with other uses of agency funding. This includes CIO involvement with planning for IT resources at all points in their lifecycle, including operations and disposition or migration.
C2.	**CIO role in program management**. CIO, CFO, and program leadership shall define an agency-wide process by that the CIO shall advise on all planning described in CI.

Response: As an outcome of GSA IT consolidation, the GSA CIO oversees [or participates in the governance of] the operations and delivery of IT services for the entire agency. All initiatives with an IT component are reviewed by the CIO or the CIO's designees, the Associate CIOs. This is made possible through the CIO's representation on governance boards (through the Associate CIOs) around the agency and through the collaboration of the CIO and CFO on the agency budgeting process.

The GSA CIO or his designees, the Associate CIOs, review not only EBCs, but all IT budget requests in accordance with GSA budget processes. While GSA IT is exclusively responsible for IT resourcing and management, the existing enterprise IT governance structure is leveraged to review EBCs for both IT and non-IT requests. The CIO (or CIO's delegate) reviews and validates non-IT requests helping to ensure there is no impact to the IT portfolio.

The CIO, through the GSA enterprise governance structure, reviews the existing IT portfolio (includes majors and nonmajors) on an ongoing basis through the agency Capital Planning processes, high risk investment re-

views, project health checks, benefits realization, and application rationalization processes.

D1.	**CIO reviews and approves major IT investment portion of budget request**. Agency budget justification materials in their initial budget submission to OMB shall include a statement that affirms: • the CIO has reviewed and approves the major IT investments portion of this budget request; • the CFO and CIO jointly affirm that the CIO had a significant role in reviewing planned IT support for major program objectives and significant increases and decreases in IT resources; and • the IT Portfolio (formerly Exhibit 53) includes appropriate estimates of all IT resources included in the budget request.
D2.	**CIO and CFO Certify IT Portfolio.** The CFO shall work with the CIO to establish the affirmations in D1.

Response: We have reviewed the relevant text in Circular A-11 - Sec. 51.3, Analysis of resources. GSA IT and the CFO included these affirmations in the September budget (FY17) submission. This practice will be continued in all future submissions.

2.2 Budget Execution

E1.	**Ongoing CIO engagement with program managers.** The CIO should establish and maintain a process to regularly engage with program managers to evaluate IT resources supporting each agency strategic objective. It should be the CIO and program managers' shared responsibility to ensure that legacy and ongoing IT investments are appropriately delivering customer value and meeting the business objectives of programs.
E2.	**Ongoing CIO engagement with program managers.** Program managers shall work with the CIO to define IT performance metrics and strategies to support fulfillment of agency strategic objectives defined in the agency's strategic plan.

Response: GSA will maintain its established practice for FITARA implementation. GSA's CIO is a member of the IRB at GSA and maintains line of sight accountability, through the Associate CIOs, to portfolio-level (or business line) governance boards. This provides a firsthand view to upcoming new initiatives, reprogramming requests, and portfolio performance. The budgeting process, overseen by the CFO, requires the preparation, review, and approval of an Executive Business Case (EBC) for all initiatives. The EBC provides the rationale for the proposed investment, describes the alignment of the investment to agency business and IT strategy, offers an alternatives analysis, posits benefits, and forecasts return on investment. The EBC also contains investment performance metrics supporting the business and IT strategic goals and planned performance targets are identified. GSA IT reviews all EBCs for potential IT components or impacts to the IT portfolio of resources. The outcomes of these reviews inform the updates to the agency capital planning process which results in the input to the agency IT portfolio summary and major IT business cases (formerly Exhibits 53 and 300).

GSA has a formal integrated Capital Planning and Investment Control process. The CIO works closely with the program managers to establish criteria for determining the ongoing health of their investments. The CIO meets with the program managers/investment owners on a monthly basis to review the health of their investments based on information contained in their monthly control reports and information in Project Central (GSA's project management information system).

On a monthly basis, the CIO and or his delegates, the Associate CIOs, conducts a review of the information contained in the monthly control reports for all GSA Major IT Investments. The reports are scored against established criteria that have been communicated with the Project Managers and Investment Owners to ensure that investments are within EVM variance, meeting performance measures goals, monitoring risks and are exhibiting strong project management. Preliminary ratings are sent to the project managers and sponsors of the investments and the CIO works with them to correct minor discrepancies and track progress towards resolving performance issues.

The Associate CIOs regularly meet with the business leaders. Each Associate CIO is a member of the Program Advisory Board, the Service and Staff Office governance body, representing the CIO. For example, the GSA IT Associate CIO for Finance and Human Resources Management participates in the BAAR Monthly Executive Meeting for program review. The Monthly Project Status meetings provide updates on cost, schedule, and performance for all key IB projects including USDA - GSA FM Migration Phase 2 and will include HR LOB Migration (pre-phases). The IBF Director is a partner with OHRM for HRLOB Divestment HR, and the Associate CIO sits on the new HRLOB Steering Committee as stakeholder / voting member. The roles of the Associate CIOs for Workspace and Acquisition & Fleet are analogous.

F1.	**Visibility of IT planned expenditure reporting to CIO.** The CFO, CAO and CIO should define agency-wide policy for the level of detail of planned expenditure reporting for all transactions that include IT resources.
F2.	**Visibility of IT planned expenditure reporting to CIO.** The CFO, CAO and CIO shall define agency-wide policy for the level of detail of planned expenditure reporting for all transactions that include IT resources.

Response: All GSA IT expenditures, including funds spent in GSA IT or elsewhere within the Agency, are entered into the Financial Planning Application (FPA), used for agency-wide annual planning, during budget formulation. Once GSA organizations enter requests into FPA, the CIO will review IT related requests and coordinate with those organizations as budgets are reviewed and approved. After approval, the CIO will monitor IT expenditures. Financial obligations spent against that plan are tracked in the GSA financial system, Pegasys. The CFO provides guidance on the level of detail required in FPA each year. Based on OMB direction for capital planning and IT reporting, the CIO provides guidance to IT investment owners on the level of detail required for OMB 53s and 300s and related capital planning. The CIO ensures that capital planning numbers match the FPA data. On a quarterly basis, the CIO and the CFO perform a line-by-line review of IT expenditures. There is a limited amount of IT spending in GSA that occurs outside the bounds of the GSA IT budget. Some parts of this, i.e., eGov investments, may remain outside of GSA IT pending resolution of how these fit in the statute.

G1.	**CIO defines IT processes and policies.** The CIO defines the development processes, milestones, review gates and the overall policies for all capital planning, enterprise architecture, and project management and reporting for IT resources. At a minimum, these processes shall ensure that the CIO certifies that IT resources are adequately implementing incremental development (as defined in the below definitions). The CIO should ensure that such processes and policies address each category of IT resources appropriately—for example, it may not be appropriate to apply the same process or policy to highly customized mission-specific applications and back office enterprise IT systems depending on the agency environment. These policies shall be posted publicly at agency.gov/digital strategy, included as a downloadable dataset in the agency's Public Data Listing, and shared with OMB through the IDC. For more information, see OMB Circular A-130, Management of Information Resources.
	Response: With the consolidation of IT at GSA, the CIO oversees all aspects of IT operations management. Instructional Letters, policy directives, and formal guidance are published under the CIO's signature. GSA will depend upon this institutional norm for FITARA implementation. We are aware of and monitor incremental delivery, with a particular emphasis for identifying a development modality for legacy COBOL mainframe systems still relying on traditional waterfall methodology. Progress has been made in this area, with the Acquisition Services portfolio team implementing Kanban (an Agile variant) to improve the management of the software development process. In FY2015, GSA IT undertook a cover-to-cover revision of its guidance for system development lifecycle management. This was done to acknowledge the prominence of Cloud-based solutions, Agile, and incremental delivery of functionality as a product of the Agile method of development. The revised guidance and policy updates will be implemented in FY2016.

H1.	**CIO role on program governance boards.** In order to ensure early matching of appropriate IT with program objectives, the CIO shall be a member of governance boards that include IT resources (including "shadow IT" or "hidden IT"—see definitions), including bureau Investment Review Boards (IRB). The CIO shall notify OMB of all governance boards the CIO is a member of and at least annually update this notification.
H2.	Participate with CIO on governance boards as appropriate.
	GSA will rely upon the well-established enterprise governance framework that is tightly integrated with the budget development and execution processes to support this requirement of FITARA implementation. GSA's CIO is a member of all key Investment Review Boards (IRBs) at GSA. This provides a first-hand view to upcoming new initiatives, reprogramming requests, and portfolio performance.
	To ensure informed decision making and effective management of its resources and IT investments, GSA established the GSA-level IRB. The GSA CFO and CIO serve as the co-Chairs of this board with the agency Deputy Administrator, and are responsible for identifying, selecting, and prioritizing IT needs within GSA. The IRB:
	• *Reviews investment options and ensures the recommended investments align with agency priorities, strategic goals, and provide best value for the agency* • *Directs oversight and authority over the consolidated agency investment budget*

- *Reviews and evaluates EBCs to develop approval recommendations*

Supporting the IRB are the GSA program advisory boards (PABs), portfolio focused boards that provide enterprise, PBS, and FAS business and IT recommendations to the IRB. The CIO currently serves as the Chair for the Enterprise Advisory Board on a six month, rotating basis. The PABs:
- *Make the final recommendation on the investment portfolio*
- *Ensure business cases are sound; confirm business cases align to SSO/Program Office and GSA's long-term goals*
- *Assess internal reviews, evaluations, and audits of proposed initiatives that analyze the cost(s) and benefit(s) of each initiative*
- *Ensure an adequate return on investment (ROI), either financial or performance*
- *Give assurance that the proposed investment will meet service delivery needs*
- *Gauge project risk, complexity, and level of analysis required*
- *Confirm funding is available and check for duplicative solutions to requirements*
- *Confirm if investment meets established threshold for IRB review*

Using application rationalization and prioritization methods, business and IT stakeholders across GSA work together to understand and define portfolio and enterprise needs and priorities. Boards at each level of governance recommend and approve off-cycle investment concepts and review the annual IT budget request, funding allocations, tradeoffs, prioritizations, and changes to established budgets.

2.3 Acquisition

I1.	Shared acquisition and procurement responsibilities. The CIO reviews all cost estimates of IT related costs and ensures all acquisition strategies and acquisition plans that include IT apply adequate incremental development principles (see definitions).
I2.	Shared acquisition and procurement responsibilities. The CAO, in consultation with the CIO and-where appropriate-CFO, shall ensure there is an agency-wide process to ensure all acquisitions that include any IT:

• Are led by personnel with appropriate federal acquisition certifications (FACs), including specialized IT certifications as appropriate.

Response: GSA will use the existing FAI federal acquisition certification (FAC) framework to certify acquisition Program/Project Managers (P/PMs). This framework includes the OFPP FAC P/PM Memorandum, the competency models referenced therein for core P/PM certification and the core-plus IT specialization, the P/PM Functional Advisory Board to coordinate periodic efforts to re-validate and refine the competency models, and the FAITAS system to manage the certification process.

FAI will leverage feedback from acquisition P/PMs, Acquisition Career Managers, CIOs, CAOs, CHCOs, and other Federal stakeholders of the FAC P/PM core-plus IT specialization program, to develop and refine additional core and specialty track competency models, training offerings, and certification programs for COR, P/PM and Contracting personnel.

For example, capitalizing on the imperatives established by M-15-14, GSA is working with OMB to convene an

Interagency IT Program Management Summit with the CIO, CAO, CHCO, and other stakeholder communities, to better align and integrate our collective workforce development efforts. The focus of this first summit will be to develop a consensus outline of an integrated governance model for the IT Technical, IT Acquisition, and IT Program Management competency spaces. Such a model will (1) assure agency-level flexibility to develop an IT workforce capable of meeting unique mission requirements, (2) permit faster promulgation of government-wide IT and acquisition policies, and (3) enable enhanced portability of workforce skills and certifications across agencies, support greater career mobility for acquisition professionals, simplify the certification process, and reduce workforce development costs.

- *During FY16, GSA will begin to establish criteria and initiate programs to identify and develop an IT cadre within GSA.*

- *GSA plans to deploy the specialized career path for IT Program and Project Managers.*

- *GSA plans to launch an IT Acquisition Cadre Dashboard to promote transparency and accountability in the management of GSA's Capital Asset Programs (Exhibits 300).*

- *Subject to the deployment of new policy and guidance, GSA also plans to deploy the specialized career path for IT Contracting Professionals.*

During FY17, GSA will build on these programs:

- *GSA plans to develop a competency assessment to evaluate skill gaps of the IT Cadre across GSA.*
- *GSA may develop a cross-functional training program for acquisition IT and program personnel or other applicable methodologies to close skill gaps.*
- *GSA may explore a peer review process for IT Acquisitions.*

• Are reviewed for opportunities to leverage acquisition initiatives such as shared services, category management, strategic sourcing, and incremental or modular contracting and use such approaches as appropriate.

Response: As a part of acquisition planning, the FAR requires procurement teams to evaluate all feasible acquisition alternatives, identify prospective sources, and conduct market research, special contracting methods, and other contracting considerations as they apply to the procurement. As a part of evaluating these elements of an acquisition, contracting teams are inherently reviewing opportunities to leverage acquisition initiatives such as shared services, category management, strategic sourcing, and incremental or modular contracting to determine their applicability and feasibility for each procurement.

The agency CIO is a co-chair of the IRB and also a voting member on Steering Committees, including Acquisition. This enables the agency CIO the approval authority and fiscal insight into the delivery of shared services by groups like 18F, Federal Acquisition Service (FAS) Office of Integrated Technology Services (ITS), and OGP. As part of the PortfolioStat process, GSA has reported 21 Shared Services along with the contact information and role of the agency senior officials in the Commodity IT list at max.gov. With the recent OMB announcement of the Unified Shared Services Management (USSM) office under GSA OGP (Office of Governmentwide Policy), USSM will set forth policies, procedures, processes and best practices to enable feasible and innovative shared services across the federal government. The USSM will be comprised of representatives from OMB, OPM, and Department of Treasury alongside the CHCO, CFO and CIO councils and others. GSA IT is collaborating in the USSM office as the government-wide Shared Service Center (SSC) and will ensure proper involvement of the CIO and adaptation of the governance process for shared services across GSA.

• Are supported by cost estimates that have been reviewed by the CIO.

Response: While the FAR does not require cost estimates for all procurements, it is common and customary for contracting officers to request them for all moderate to large sized procurements to support them in determining the requirements that will govern their procurement. Cost estimates are provided by the program office request-ing the purchase and are required to be signed and dated by the responsible government official. If the estimate is prepared using contract support, the signature page must clearly indicate a Government associate has re-viewed and approved the estimate. If estimates are required and/or requested for IT purchases, they should be prepared and/or approved by a responsible government official from the CIO's office.

In the case that procurement contains an IT component as a subset of a larger non-IT purchase, resulting in the estimate being prepared by someone other than the CIO's office, and then review of the estimate can be achieved through the acquisition plan routing. Since estimates are required to be included in written acquisition plans and written acquisition plans are then routed through various individuals, the contracting officer can in-clude the CIO's office in the routing list to ensure review and approval.

J1.	**CIO role in recommending modification, termination, or pause of IT projects or initiatives**. The CIO shall conduct TechStat reviews or use other applicable performance measurements to evaluate the use of the IT resources of the agency. The CIO may recommend to the agency head the modification, pause, or termination of any acquisition, investment, or activity that includes a significant IT component based on the CIO's evaluation, within the terms of the relevant contracts and applicable regulations.

Response: GSA IT has adopted a proactive process that combines actively monitoring project performance through regular in-process reviews known as project health checks and monthly high risk assessments. The process synthesizes investment management and project management oversight. Monthly project health checks assess major IT initiative performance and risk management. In turn, the outcome of the health checks factor into the monthly rating of investments reported on the IT Dashboard by GSA's portfolio management team. It provides for a deep dive into risks and performance challenges, root cause analysis, corrective measures, and the path forward. The CIO and senior IT leadership assess the findings and may recommend to the Administra-tor a course of action that incorporates an executive review of a project or initiative, a TechStat, or modifies, temporarily halts, or terminates work on IT projects or investments.

In the spring of 2015, the CIO established the IT Performance Assessment Team (IPAT) as a means of identify-ing any investments that are or may become "at risk" so that issues can be resolved in a timely manner. Regu-lar meetings are held monthly to review various factors that would determine if an investment is "at risk" (Special Interest, Moderate Risk, or High Risk) In order to get a comprehensive determination, the members of the team represent various offices to ensure an integrated perspective. The team consists of Portfolio Management Team (PfM), Governance, Enterprise Architecture (EA), Project Management (PMO) and Vendor Management (VMO).

If an investment is determined to be at moderate or high risk, it is referred to governance boards for further ac-tion. These actions are communicated to the Program Managers and the IT Performance Assessment Team, and the investments are monitored until the investments are no longer deemed "at risk".

In addition to these controls, GSA IT is implementing a Benefits Realization program. This program will allow GSA IT to make better use of IT resources by closely linking initiative performance to tangible and intangible benefits defined and committed to by the initiative's business sponsor and the project team. The strategic

framework is currently being put in place for FY2016. During FY2016 we will be targeting opportunities to test this approach. These early proof-of-concept efforts will allow us to refine the process and ensure the value of this approach. We expect to fully implement this in FY2017.

K1.	**CIO review and approval of acquisition strategy and acquisition plan**. Agencies shall not approve an acquisition strategy or acquisition plan (as described in FAR Part 724) or interagency agreement (such as those used to support purchases through another agency) that includes IT without review and approval by the agency CIO. For contract actions that contain IT without an approved acquisition strategy or acquisition plan, the CIO shall review and approve the action itself. The CIO shall primarily consider the following factors when reviewing acquisition strategies and acquisition plans: • Appropriateness of contract type; • Appropriateness of IT related portions of statement of needs or statement of work; • Appropriateness of above with respect to the mission and business objectives supported by the IT strategic plan; and • Alignment with mission and program objectives in consultation with program leadership.
K2.	**CAO is responsible for ensuring contract actions that contain IT are consistent with CIO approved acquisition strategies and plans.**

Response: The FAR requires contracting teams to plan all acquisitions. This is primarily achieved through written acquisition plans that are prepared by contracting officers in conjunction with the requesting office and other stakeholders as appropriate. Once prepared, written acquisition plans are routed through various individuals, including the requesting office. When the requestor is the CIO office, the acquisition plan will be developed in close collaboration with CIO staff to ensure requirements, scope, etc. are consistent with CIO approved acquisition strategies and plans.

In the event that procurement contains an IT component as a subset of a larger non-IT purchase, then the contracting officer will ensure that the Office of the CIO is included in the routing list for the Acquisition Plan to ensure review and approval.

After the initial approval of an acquisition plan, the FAR requires the planner to review and revise the plan as appropriate "whenever significant changes occur, and no less often than annually." If any proposed contract modification were to substantially change the scope of a contract such that it rendered the acquisition inconsistent with the project's acquisition strategy, including IT requirements, then this would trigger an update to the acquisition plan, which would again be subject to review by the Office of the CIO.

J1.	**CIO role in recommending modification, termination, or pause of IT projects or initiatives**. The CIO shall conduct TechStat reviews or use other applicable performance measurements to evaluate the use of the IT resources of the agency. The CIO may recommend to the agency head the modification, pause, or termination of any acquisition, investment, or activity that includes a significant IT component based on the CIO's evaluation, within the terms of the relevant contracts and applicable regulations.

Response: GSA IT has adopted a proactive process that combines actively monitoring project performance through regular in-process reviews known as project health checks and monthly high risk assessments. The process synthesizes investment management and project management oversight. Monthly project health checks assess major IT initiative performance and risk management. In turn, the outcome of the health checks factor into the monthly rating of investments reported on the IT Dashboard by GSA's portfolio management team. It provides for a deep dive into risks and performance challenges, root cause analysis, corrective measures, and the path forward. The CIO and senior IT leadership assess the findings and may recommend to the Administrator a course of action that incorporates an executive review of a project or initiative, a techstat, or modifies, temporarily halts, or terminates work on IT projects or investments.

In the spring of 2015, the CIO established the IT Performance Assessment Team as a means of identifying any investments that are or may become "at risk" so that issues can be resolved in a timely manner. Regular meetings are held monthly to review various factors that would determine if an investment is "at risk" (Special Interest, Moderate Risk, or High Risk) In order to get a comprehensive determination, the members of the team represent various offices to ensure an integrated perspective. The team consists of Portfolio Management Team (PfM), Governance, Enterprise Architecture (EA), Project Management (PMO) and Vendor Management (VMO).

If an investment is determined to be at moderate or high risk, it is referred to governance boards for further action. These actions are communicated to the Program Managers and the IT Performance Assessment Team, and the investments are monitored until the investments are no longer deemed "at risk".

In addition to these controls, GSA IT is implementing a Benefits Realization program. This program will allow GSA IT to make better use of IT resources by closely linking initiative performance to tangible and intangible benefits defined and committed to by the initiative's business sponsor and the project team. The strategic framework is currently being put in place for FY2016. During FY2016 we will be targeting opportunities to test this approach. These early proof-of-concept efforts will allow us to refine the process and ensure the value of this approach. We expect to fully implement this in FY2017.

L1.	**CIO approval of reprogramming**. The CIO must approve any movement of funds for IT resources that requires Congressional notifications.
L2.	**CIO approval of reprogramming.** The CFO shall ensure any notifications under L1 are approved by the CIO prior to submission to OMB.

Response: The GSA IT budget does not contain appropriated funding, but GSA does manage appropriated funding that may support information technology. Formulation and reprogramming of funds are managed by the governance processes within the offices with appropriated funds. GSA IT is funded through the Working Capital Fund; therefore costs are billed backed to Agency customers who may use appropriated funds to pay for IT services.

GSA IT has established processes to review change requests during the fiscal year and feeds change requests into the established governance process to ensure changes meet mission needs, are of appropriate priority, and to identify trade-offs if necessary. During the execution year, GSA IT regularly reviews activity against the spend plan, including monitoring obligations. When the actual obligations are lower than the budgeted amount any unused funding may be repurposed to projects approved by governance. During annual budget formulation processes, the CIO, CFO, Administrator and internal customers review plans and identify changes to overall

cost. The CFO or the office with the appropriated funds will identify any changes that require Congressional notifications so they can be reviewed.

In addition, the agency has recently put in place a quarterly review of contracts by the CFO's office. GSA IT is an executive member of this board and has direct visibility and input into IT-related contracts including shifts in priority and reprogramming of IT-related funds. On a quarterly basis, the CFO's office, with direct input and visibility from the CIO, or his designee, reviews all contracts meeting defined criteria to ensure their continued basis of need, appropriate funding levels, and acceptable levels of performance and service or product delivery.

2.4 Organization and Workforce

M1. **CIO approves bureau CIOs.** The CIO shall be involved in the recruitment and shall approve the selection of any new bureau CIO (includes bureau leadership with CIO duties but not title-see definitions). The title and responsibilities of current bureau CIOs may be designated or transferred to other agency personnel by the agency head or his or her designee as appropriate and such decisions may take into consideration recommendations from the agency CIO.

Response: There is no bureau CIOs at GSA. Neither the title nor the duties of the CIO exist outside GSA IT. The Associate CIOs report directly to the CIO and are the CIO's delegate in specific instances.

In 2012 during a top-to-bottom analysis of GSA's IT operations and assets, it was determined there was substantial redundancy and inefficiency in the then-federated model. Subsequent to this determination, the agency undertook a program to consolidate all IT operations under a single entity, the GSA Chief Information Officer. Authority and responsibility for the IT portfolio was centralized under the CIO and the service and staff office "CIOs" subordinated to the agency CIO.

N1. **CIO role in ongoing bureau CIOs' evaluations**. The CHCO and CIO shall jointly establish an agency-wide critical element (or elements) included in all bureau CIOs' performance evaluations. In cases where the bureau CIO is a member of the Senior Executive Service and the agency uses the Basic SES Appraisal System, this critical element(s) is an "agency-specific performance requirement" in· the Executive Performance Plan. Each such agency may determine that critical element(s) (ECQs) contain these requirements. For agencies that do not use the Basic SES Appraisal System or for bureau CIOs who are not members of the SES, then these shall be critical elements in their evaluations.

The [agency] CIO must identity "key bureau CIOs" and provide input to the rating official for this critical element(s) for at least all "key bureau CIOs" at the time of the initial summary rating and for any required progress reviews. The rating official will consider the input from the [agency] CIO when determining the initial summary rating and discusses it with the bureau CIO during progress reviews.

N2. **CIO role in ongoing bureau CIOs' evaluations.** The CHCO and CIO shall jointly establish an agency-wide critical element (or elements) for the evaluation of bureau CIOs as described in N I.

Response: No bureau CIOs at GSA. The Associate CIOs report directly to the agency CIO who oversees their

performance plans and evaluations. To ensure the CIO has full visibility into all agency IT investments, the CIO participates in all governance reviews on a business line level. To further support this process, the Associate CIOs work closely with the business lines to ensure full visibility into IT investment.

OI.	**Bureau IT Leadership Directory.** CIO and CHCO will conduct a survey of all bureau CIOs and CIO and CHCO will jointly publish a dataset identifying all bureau officials with title of CIO or duties of a CIO. This shall be posted as a public dataset based on instructions in the IDC by August 15, 2015 and kept up-to-date thereafter. The report will identify for each: • Employment type (e.g. GS, SES, SL, ST, etc.) • Type of appointment (e.g. career, appointed, etc.) • Other responsibilities (e.g. full-time CIO or combination CIO/CFO) • Evaluation "rating official" (e.g. bureau head, other official) • Evaluation "reviewing official" (if used) • Whether [agency] CIO identifies this bureau CIO as a "key bureau CIO" and thus requires the [agency] CIO to provide the rating official input into the agency-wide critical element(s) described in N I.
O2.	Bureau IT Leadership Directory. CHCO will work with CIO to develop the Bureau IT Leadership Directory as described in OI.

Response:
There are neither bureaus nor bureau IT leadership roles at GSA. There are within GSA IT, Associate CIOs who though not titled as CIO and not bearing the same authority or accountability do influence decisions on IT resources. These individuals will be cited in the Directory.

P1.	**IT Workforce.** The CIO and CHCO will develop a set of competency requirements for IT staff and develop and maintain a current workforce planning process to ensure the department/agency can (a) anticipate and respond to changing mission requirements, (b) maintain workforce skills in a rapidly developing IT environment, and (c) recruit and retain the IT talent needed to accomplish the mission.
P2.	**IT Workforce.** CIO and CHCO-and CAO where relevant-shall develop a set of competency requirements for IT staff, including IT leadership positions, and develop and maintain a current workforce planning process to ensure the department/agency can (a) anticipate and respond to changing mission requirements, (b) maintain workforce skills in a rapidly developing IT environment, and (c) recruit and retain the IT talent needed to accomplish the mission.

Response: The IT skills assessment working group, an agency-wide team of subject matter experts tasked with developing a slate of core competencies for IT professionals (Series 2210) at GSA, concluded its work in July 2015. The team's recommendations have been approved by GSA IT leadership approval (July 2015) and submitted to the Agency CHCO for final review. Concurrently, the Offices of Government Policy, Human Resources Management, and GSA IT have been engaged in workforce planning efforts that are focused on IT professionals, IT Project Management Professionals, and IT Acquisition professionals. We expect to implement the out-

comes of the competency/skills assessment in FY2016.

Q1.	**CIO reports to agency head (or deputy/COO).** As required by the Clinger Cohen Act and left in place by FITARA, the CIO "shall report directly to such agency head to carry out the responsibilities of the agency under this subchapter."
	This provision remains unchanged, though certain agencies have since implemented legislation under which the CIO and other management officials report to a COO, Undersecretary for Management, Assistant Secretary for Administration, or similar management executive; in these cases, to remain consistent with the Clinger Cohen requirement as left unchanged by FITARA, the CIO shall have direct access to the agency head (i.e., the Secretary, or Deputy Secretary serving on the Secretary's behalf) regarding programs that include information technology.

Response: The GSA agency CIO reports to the COO/Deputy Administrator of GSA. This relationship was defined during the CXO consolidation effort that was begun in 2012.

3 GSA FITARA CIO Assignment Plan

The Associate CIOs (ACIOs) for workplaces, corporate systems (OHRM, OAS, CFO), acquisitions and fleet/transportation are granted authority to oversee the routine IT operations for those respective operations, which include: participation in governance meetings with the business lines as appropriate, IT program reviews, contract and budget reviews, reprogramming requests and baseline change requests. Based on thresholds and criteria established through the Investment Review Board (IRB), of which the CIO is a co-chair, high value/risk/visibility initiatives are escalated for additional review. Accountability is line-of-sight as these individuals are direct reports acting for the CIO with a specific charter governing the breadth of authority. IT budget approval and contract approval for major IT investments (as defined in A-11) will not be delegated.

Delegation of Authority

Name	Title	Contact Information
Vacant	Deputy CIO	
Kris Rowley	Chief Data Officer	kris.rowley@gsa.gov
Sagar Samant	Associate CIO, Acquisition Services and Fleet/Transportation	sagar.samant@gsa.gov
Philip Klokis	Associate CIO, Workplaces	philip.klokis@gsa.gov
Elizabeth DelNegro	Associate CIO, Corporate Services	elizabeth.delnegro@gsa.gov
Investment Review Board (IRB)	CIO, Co-chair	enterprise-it-governance@gsa.gov

The operations of the IRB and business line governance are described below.

To ensure informed decision making and effective management of its resources and IT investments, GSA established the GSA-level IRB. The IRB is presided over by the GSA Deputy Administrator, with the GSA CFO and CIO as the co-chairs of this board, responsible for identifying, selecting, and prioritizing IT needs within GSA. The IRB:

- Reviews investment options and ensures the recommended investments align with agency priorities, strategic goals, and provide best value for the agency
- Directs oversight and authority over the consolidated agency investment budget
- Reviews and evaluates EBCs to develop approval recommendations

Supporting the IRB are business line or portfolio-focused governance boards who provide enterprise and business-line recommendations for the services and staff offices (SSOs) of GSA to the IRB. The CIO is represented by the Associate CIOs. The boards:

- Make the final recommendation on the investment portfolio

- Ensure business cases are sound and align to SSO/Program Office and GSA's long-term goals
- Assess internal reviews, evaluations, and audits of proposed initiatives that analyze the cost(s) and benefit(s) of each initiative
- Ensure an adequate return on investment (ROI), either financial or performance
- Give assurance that the proposed investment would meet service delivery needs
- Gauge project risk, complexity, and level of analysis required
- Confirm funding is available and checks for duplicative solutions to requirement
- Confirm if investment meets established threshold for IRB review

The charters of the business line governance boards delegate portfolio-level authority to the boards and the Associate CIOs, who are representing the CIO at this level and are direct ports. Decisions and recommendations made by these business line governance boards are communicated to the CIO, ensuring CIO-level accountability and oversight of GSA's IT decisions, via the mechanisms described below:

- IRB (of which CIO is co-chair) review of budget formulation recommendations and decisions - Monthly or as needed
- IRB (of which CIO is co-chair) review of IT business case recommendations for approval and funding of new requests or requests for reprogramming of funds – Monthly or as needed
- IT Leadership Team meetings and CIO staff meetings held once weekly, both chaired by the CIO and attended by the Associate CIOs and other senior GSA IT staff
- Quarterly budget reconciliations with CFO and CIO